

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Case No. 04-CV74932

CHARLES HADDAD,

Plaintiff, Honorable Anna Diggs Taylor

vs. Magistrate Judge Donald A. Scheer

INDIANA PACERS, an assumed name,
a/k/a PACERS BASKETBALL CORPORATION,
an Indiana Corporation, JERMAINE
O'NEAL, and ANTHONY JOHNSON, Jointly
and Severally,

Defendants.

/

The Deposition of KRIS SIADI, a Witness herein,
taken pursuant to Notice of Taking Deposition before
Shari Blythe Holtz, CSR-3910, Registered Professional
Reporter and Notary Public within and for the County of
Wayne, State of Michigan, at 5510 Woodward Avenue,
Detroit, Michigan, on Wednesday, May 24, 2006, commencing
at about 11:25 a.m.

APPEARANCES:

L.S. CHARFOOS, ESQ., P11799
Charfoos & Christiansen, P.C.
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(313) 875-8080

For the Plaintiff.

STEVEN M. POTTER, ESQ., P33344
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(248) 377-1700

For Indiana Pacers.

(Appearances continued on page 2.)

Wednesday, May 24, 2006

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1 Q Was he unconscious?
 2 A I don't think he was unconscious.
 3 Q Was anybody attending to him? Or was he just laying
 4 there in the middle of the room?
 5 A It seemed like he was just laying there in the middle of
 6 the room. There were medical people in there looking at
 7 him, but they weren't like over the top of him.
 8 Q They were not over the top of him?
 9 A Not that I saw, no.
 10 Q How long were you in that place?
 11 A I don't remember. I couldn't even give you an estimate.
 12 I can't remember.
 13 Q So what happened, then, after you got there and saw
 14 Charlie on the floor, then what's the next thing that
 15 happened?
 16 A They took him away to the hospital.
 17 Q Who is "they"?
 18 A Medics.
 19 Q Did you go with him?
 20 A No, not in the ambulance. I drove separate.
 21 Q So from the time you got to Charlie until the time they
 22 took Charlie away, you have no recollection of talking to
 23 Charlie?
 24 A Not that I can remember, no. I don't remember any
 25 conversation.

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1 the hospital?
 2 A No.
 3 Q And I think I asked you, you had no contact with Charlie
 4 that night at the Piston game?
 5 A I knew he was there.
 6 Q Did you talk to him?
 7 A On the phone.
 8 Q Did he appear to be intoxicated at any point in time that
 9 night?
 10 A No, not that I know of.
 11 Q Based on what you could hear on the phone?
 12 A No.
 13 Q Did you see him drinking that night?
 14 A No.
 15 Q Do you know what Charlie's drinking habits are?
 16 A No.
 17 Q Do you know him to drink? Have you ever known him to
 18 drink alcohol or beer or wine?
 19 A Yes.
 20 Q Did you have season tickets to the Pistons?
 21 A No.
 22 Q You just happened to be there that night?
 23 A Yes.
 24 Q You knew Charlie had season tickets?
 25 A Yes.

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1 Q Do you remember Charlie talking, even though you can't
 2 remember what he was saying?
 3 A Not that I can remember, no.
 4 Q Do you remember anything anybody said to you in the place
 5 Charlie was when you got to him?
 6 A No.
 7 Q And is that true from the time you got to Charlie until
 8 the time you left the Palace?
 9 A Anybody talk to me about him? I mean, I talked to people
 10 to get back there and I talked to people in the room, but
 11 I don't remember exactly what was said.
 12 Q That's what I'm asking.
 13 Do you recall anything that was said by anybody
 14 from the time you first got to Charlie until they took
 15 Charlie away in an ambulance?
 16 A No. I do not recall, no.
 17 Q Do you recall anything anybody said from the time you
 18 first got to Charlie until you left the Palace?
 19 A No.
 20 Q At the time you got to Charlie, were you aware that
 21 Charlie had gone onto the floor?
 22 A No.
 23 Q Were you ever aware that Charlie had gone onto the
 24 floor -- did you become aware of that fact at any time
 25 you were aware at the Palace before they took Charlie to

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1 Q Had you ever been to a basketball game with Charlie at
 2 the Palace prior to November of '04?
 3 A Yes.
 4 Q Had you ever observed Charlie's drinking habits at the
 5 basketball games you've been to with him?
 6 A No.
 7 Q Did you ever observe Charlie being a problem at the
 8 basketball game?
 9 A No.
 10 Q Did you ever see him talked to by security at the
 11 basketball games?
 12 A No.
 13 Q Were you aware Charlie was a problem at Piston games?
 14 A No.
 15 Q Have you ever seen any reports indicating -- describing
 16 his behavior?
 17 A No.
 18 Q Do you know that he had been talked to by the head of
 19 security about his behavior?
 20 A No.
 21 Q Did you know if Charlie had ever threatened to throw beer
 22 on NBA players before that night?
 23 A No.
 24 Q Do you find that hard to believe?
 25 A Yes.

<p style="text-align: right;">Page 18</p> <p>1 Q You've never seen a report where Charlie admitted he 2 wanted to do that? 3 MR. CHARFOOS: Wait. You are arguing with him. 4 BY MR. POTTER: 5 Q I'm asking you, had you ever seen a report where Charlie 6 admitted he wanted to do that? 7 A No. 8 MR. CHARFOOS: Nor have I. 9 BY MR. POTTER: 10 Q Did you and Rose follow -- or go to the hospital where 11 Charlie was taken? 12 A Yes. 13 Q When you got to the hospital, were any other family 14 members there? 15 A No. I think I was the first one. 16 Q You and Rose? 17 A Rose and I, yes. 18 Q What happened to Sharbell and Bree? 19 A They just stopped us off. I think they came in for a 20 minute and then they left. They had to leave. 21 Q It was their vehicle? 22 A Yes. Sharbell drove. 23 Q So they dropped you off; you and Rose stayed at the 24 hospital? 25 A Yeah, I think they came in for a minute and they had to</p>	<p style="text-align: right;">Page 20</p> <p>1 him why he went on to the floor? 2 A No. 3 Q You are aware he did go on to the floor. Have you seen 4 videotape of him on the floor? 5 A I've seen videotapes. 6 Q Would you agree he was on the basketball court? 7 A No. 8 Q No? 9 MR. CHARFOOS: The videotape will speak for 10 itself. 11 BY MR. POTTER: 12 Q I'm asking what you saw on the videotape. 13 A I don't know what I saw. 14 Q You don't know what you saw on the videotape? 15 A No. 16 Q Did you ever talk to AJ about what happened that night? 17 A No. 18 Q Was AJ at the hospital? 19 A I don't remember. 20 Q So as I understand your testimony, you don't recall 21 anything Charlie said to you about anything at the 22 hospital? 23 A No. 24 Q Is that correct? 25 A Correct.</p>
<p style="text-align: right;">Page 19</p> <p>1 leave. 2 Q Then other family members showed up eventually? 3 A Yes. 4 Q Who else? 5 A I don't remember exactly. 6 Q Well, Mr. and Mrs. Haddad said they were there, together 7 with Ann and Rudy. 8 A Yes. 9 Q Do you recall them being there? 10 A Yes. 11 Q Did you stay at the hospital the whole time Charlie was 12 there? In other words, right up to the point where he 13 was released? 14 A I don't remember if he was released or not. 15 Q Did you ever talk to Charlie in the hospital or at the 16 hospital, either one? 17 A Yes. 18 Q What did you talk to Charlie about? 19 A I don't remember. 20 Q Do you recall anything Charlie said? 21 A No. 22 Q Did you ask Charlie what happened? 23 A No. 24 Q Have you ever asked Charlie, from the date -- from 25 November 19, '04 to the present date, have you ever asked</p>	<p style="text-align: right;">Page 21</p> <p>1 Q Who took Charlie home? 2 A I don't remember. 3 Q Did he go to Burt or did he go to your house? 4 A I don't remember. 5 (Deposition interrupted.) 6 (Short recess.) 7 --- 8 (Mr. Akkashian has now joined the deposition; 9 Mr. Apkarian has now left the deposition.) 10 BY MR. POTTER: 11 Q So you don't know where Charlie went from the hospital? 12 A No. Exactly, no. 13 Q Did you go home? 14 A I went home. 15 Q When's the next time you saw Charlie after that night? 16 A I don't remember. 17 Q Have you ever talked to Charlie about what problems he 18 alleges he has because of that night? 19 A Repeat the question. 20 Q Since the night of the brawl, have you ever talked to 21 Charlie about what problems, physical problems Charlie 22 contends he has because of what happened? 23 A He doesn't like to talk about it too much. 24 Q So you can't recall anything Charlie has ever told you is 25 wrong with him because of what happened that night?</p>